Message

From: Africa Espina [guzuna@locustec.com]
Sent: 9/13/2022 7:21:47 PM
To: Abreu, Lilian [abreu.lilian@epa.gov]
CC: J. Wesley Hawthorne [hawthornej@locustec.com]; Woo, Cynthia [cynthia.woo@aptim.com]
Subject: RE: [EXTERNAL> RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479
Attachments: 811ArquesBSA_RTC_rev3 signed.pdf; 811ArquesBSA_EPA_Rev3_clean signed.pdf; 811ArquesBSA_EPA_Rev3_redline.pdf

Hello Lilian,

Please find attached the revised 811 E. Arques Ave Building-Specific Work Plan Addendum (BSA) reflecting EPA comments and our discussion.

This email includes the following:

1)A cover letter including response to comments
2)A pdf of the report
3)A redline pdf of the text and applicable appendices

They report can also be downloaded here:
https://locustec-my.sharepoint.com/:f:/p/guzuna/EpGp09yjqXJKhRbbGQExaY8Bv73rPVBxn_1cyYDhL5Ze3g?e=sw7KjZ

Regards,

Africa

From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Monday, September 12, 2022 4:25 PM
To: Africa Espina <guzuna@locustec.com>
Cc: J. Wesley Hawthorne <hawthornej@locustec.com>; Woo, Cynthia <cynthia.woo@aptim.com>
Subject: [EXTERNAL> RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479

Africa,

thanks for reaching out.
Please inform Phillips that the plan is about to become overdue. It was expected to be submitted today. We had only minor modifications to be addressed, which were discussed and clarified over a phone call held a month ago.

I really appreciate if the plan is submitted this Tuesday. Please let EPA know what are the reasons for the delay.

Thank you,

Lilian Abreu, PhD
Environmental Engineer - Remedial Project Manager
California Site Cleanup Section I
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Office: 415.972-3010 | abreu.lilian@epa.gov

From: Africa Espina <guzuna@locustec.com>
Sent: Monday, September 12, 2022 4:00 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>
Cc: J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479

Hi Lilian,
Just wanted to let you know we haven't forgotten about this. We would like Philip's approval of the Work Plan before submission and hope to receive that soon.

Africa

From: Africa Espina
Sent: Friday, September 2, 2022 3:33 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479

Hi Lilian,
The document is going through the final stage of internal review. We will get it to you as soon as possible or by Monday, September 12th. The sampling date will be set after BSA approval to ensure equipment is available. It's looking like October at this point.

Have a good holiday weekend!

Africa

From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Thursday, September 1, 2022 4:43 PM
To: Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479

Hello Africa,

Could you please provide an update when Locus is planning to send the revised final work plan and set up the dates for Sampling?

Thank you,

Lilian Abreu, PhD
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From: Abreu, Lilian
Sent: Wednesday, July 27, 2022 7:51 PM
To: Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>; Condit, Rose <rose.condit@aptim.com>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue - CERCLIS Site ID CAD070466479

Africa:

The procedures described in the workplan requires revisions/discussions prior to approval. To help expedite final review and approval I suggest that Locus set up a online meeting including the field staff to help answer my questions. Below are my review comments.

Attached I am providing examples of texts describing sampling approach particularly for the sewer cleanout, that can be used for discussion purpose and as a guidance for Locus revision of the work plan.

Comments. Major concerns:

- Page 29 sect 5.3. Only the sampling tube line should be purged for the sewer cleanout sampling, do not purge the riser. Delete the sentence "Dimensions of the riser will be taken for purge volume calculations". See attached examples of sewer cleanout sampling procedures and revise text in this section and other sections accordingly.
- Unclear about the use of "in-line" and "ambient" helium detector. See other comments bellow about the "in-line" for sub-slab vapor pins.
- Page 116, section 2.1 –
    - It is not feasible to perform a sewer gas sampling using a shroud. Therefore, it is not possible to conduct a helium test on the sewer cleanout. Please edit the text to delete any reference to sewer gas in this section and include another section specific for sewer cleanout gas sampling. See attached to this email a few examples of write-ups for sewer cleanout sampling. One of the examples presented shows a 6L canister, but 1L canister can be used as the screening values are the same as sub-slab soil gas and the laboratory detection limits can be achieved.
    - It is unclear what "in-line Helium" means and how it would be operated for a sub-slab port sampling. This "in-line Helium" detection may not work with sub-slab port sampling as the required purge volume is very small (e.g. <50 ml), unlike other types of deep soil gas wells that could have large purging volumes (e.g. >2,000 ml). To evaluate the Helium concentration in the purged gas of a sub-slab port, it is necessary to collect the purged air in a tedlar bag (at least 300 mL is need) using a pump with flowrate not to exceed 200 mL/min. The air in the tedlar bag would be analyzed using a hand-held Helium detector. The Helium detector should not be connected directly to the purging line as its pump is not designed to purge the soil gas port.

- Indicate that a pump with flowrate not to exceed 200 mL/min will be used.
- Page 117 Sect 2.3.1 - Indicate that the laboratory sampling manifold is equipped with a flow controller not to exceed 200mL/min flowrate.
- Page 118 section 2.3.2 decrease the time for shut-in test from 5 min to 1 min.
- Page 118. The description of the "in-line Helium detector" in the purge line is questionable. Note that any purged gas needs to be collected into a tedlar bag. It should not be released into the indoor air. Also, if there would be only one hand-held helium detector, that should be inserted initially into the shroud (through a small hole on the side of the enclosure) to measure shroud concentration during purging. Once the purged air is collected in the tedlar bag, the detector is removed from the shroud and used to measure the tedlar bag concentration. After that the detector is inserted again on the shroud through the same hole, to measure shroud concentration while the sample is being collected. See attached text example.
- Page 119 section 2.3.3. Please provide clarifications to EPA about the "in-line" and "ambient" Helium detector, see previous comments.
- Page 100 "Wet/dry vacuum" I have concerns of using water and that infiltrating into the well. I would recommend applying only dry vacuum and use of PPE for anyone around 5 ft, and no one without PPE allowed within 20ft distance.
- Include QA/QC, for example:
  - number of Field duplicates and acceptable differences.
  - Laboratory QC/QA, like canister batch certified clean, etc.
  - Preservation and holding time
  - Initial canister pressure check, reject if vacuum less than 26inHg.
  - Personnel qualifications/staff trained to do the work

Other comments:

- Edit the text to indicate Helium average concentration in the shroud at 20% (range of 15% – 25%) – It should be kept in mind the detection limit of the instrument to detect the concentration in case there is a leakage. (same for section 2.3.4 on page 120)
- Page 119 section 2.3.3. Edit text as follows "…above the accepted allowed maximum (which is 5% of the shroud concentration) are not present."
- Page 119 section 2.3.3. Edit first sentence to indicate: "Following a successful shut-in test,…"
- Page 5 and page 39. Table 4 title; replace title by "Sub-Slab Soil Gas and Sewer Gas Evaluation Criteria" – on Table 4 edit the captions of the second row, replacing "Sub-Slab Screening Levels" by "Sub-Slab Soil Gas and Sewer Gas Screening Levels"
- Page 38. Table 3 title: correct it to "Sampling Locations and Analysis", as indicated on page 5.
- Page 29 sect 5.2…replace: "…the vapor pin may penetrate the barrier…"by "…the drilling through the slab may penetrate the barrier…"
- Page 30 section 5.4. replace text "…for analysis by VOC TO-15…" by "…for analysis of site-specific chemicals of concern by USEPA Method TO-15…"
- Page 100, Vapor Pin: the listed links were not accessible, please provide the files to EPA.
- Page 102. Section 2.4 Bullet 3 last sentence: include "barrier" after "moisture" to state " where the moisture barrier has been punctured"

I look forward our meeting so we can quickly clarify and resolve any pending issues

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From: Africa Espina <guzuna@locustec.com>
Sent: Monday, July 11, 2022 1:37 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Hello Lilian,

We can let Lowe's know that sampling will be conducted at a later time.

The bulleted items are in the 811 Arques BSA (the ASAOC's version of a VI SAP), and the specific sections are referenced below. For future reference, the response to comments table also cites sections where possible.

Let me know if there is anything else you need to facilitate the review.

Thanks,
Africa

From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Monday, July 11, 2022 10:35 AM
To: Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Good morning Africa,

Files received, thank you.

The schedule of July 25th is too early for me to review and approve the SAP.

Just to give you a heads up on a few things that I will pay close attention to:

- Language regarding the screening and how table 4 was defined (and original determination of target indoor air)

  See Table 4 foot notes and Section 5.4 – Sample Collection and Analysis (starts on pg. 30)

- Procedure to sample the sewer clean-out

  Section 5.3 – Sewer Cleanout Sampling Preparation (starts on pg. 29)
  Appendix F – Summa Cannister Sampling SOP (starts on pg. 108)

- SOP for sub-slab probe installation and sampling, and leak check

  Appendix E – Vapor Pin Installation SOP (starts on pg. 92)

Appendix F – Summa Cannister Sampling SOP (starts on pg. 108)
Appendix F, Section 2.3.3 - Leak Test Procedure (pg. 118)

- Indication that utility clearance will be conducted prior to probe installation.

Appendix E, Section 2.3 – Specifying Utility Locates (starts on pg. 100)

Let me know if any of these items are missing from the SAP.

Regards

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From: Africa Espina <guzuna@locustec.com>
Sent: Thursday, July 7, 2022 5:37 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>; Alan Tuan <tuana@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Subject: RE: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Hello Lilian,

Based on our call Friday, Table 4 has been revised. After reviewing the text, changes were also necessary there. Because of the changes, we went ahead and treated this as a resubmittal to facilitate the review and version tracking. The following documents are attached:

1) A revised Table 4 (the same version we agreed upon on the call)
2) Revised text in tracked changes
3) The entire report (text, tables, figures, appendices) with the revised text and table 4
4) A cover letter and response to comments table

Lowe's is ready for us to conduct the field work and would like us to come the week of July 25th. Please let us know if there need anything else you need to expedite the review process.

Regards,
Africa

Africa Espina Guzun
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From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Friday, July 1, 2022 9:23 AM
To: J. Wesley Hawthorne <hawthornej@locustec.com>; Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>
Subject: RE: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Great, thanks! That was also my thought, if possible please extend this call to 1h, so we can clarify any pending issues.

Regards,

From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, July 1, 2022 9:18 AM
To: Abreu, Lilian <abreu.lilian@epa.gov>; Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>
Subject: RE: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Hi Lilian

I wanted to talk with you this morning about this table, to get some clarity on these comments. I'll bring it up on screen during our call so we can all get on the same page.

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From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Friday, July 1, 2022 9:12 AM
To: J. Wesley Hawthorne <hawthornej@locustec.com>; Africa Espina <guzuna@locustec.com>
Cc: Woo, Cynthia <cynthia.woo@aptim.com>
Subject: Please send excel file of Table 4 - CERCLIS Site ID CAD070466479

Good morning Wes,

Could you please send me the excel file of Table 4? I am looking for presenting screening criteria only on that table. Screening IA (CR = 1E-6, HQ=1) per toxicology adopted for the site investigation with any updated toxicology criteria. Screening SG based on screening IA and AF = 0.03 consistent with current EPA guidance.

Talk to you soon. Thanks!

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From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, June 17, 2022 12:25 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>; Africa Espina <guzuna@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Alan Tuan <tuana@locustec.com>; Condit, Rose <rose.condit@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue, CERCLIS Site ID CAD070466479

Hi Lilian:

We've revised Table 4 to include the initial mitigation criteria for indoor air (as presented in the approved work plan), as well as the mitigation criteria for subslab which is calculated from the indoor criteria using the default 0.03 attenuation factor. Is this version more aligned with your expectations?

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From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Thursday, June 16, 2022 10:47 AM
To: J. Wesley Hawthorne <hawthornej@locustec.com>; Africa Espina <guzuna@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Alan Tuan <tuana@locustec.com>; Condit, Rose <rose.condit@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue, CERCLIS Site ID CAD070466479

Hello Wes,

We just started reviewing this SAP but before we proceed, could you please send us an updated Table-4 (attached) with the corrected screening values for soil gas?
In your original version Locus proposed using "indoor air concentration" values to screen sub-slab soil gas, and EPA recommended using vapor intrusion screening values (VISL) defined for soil gas, because the proposed "indoor air" values would be too conservative for screening, since there are no crawlspaces being investigated.

Per our conference call on held on last April, 25th, EPA provided clarifications of comment 5d below, indicating the most stringent target values for indoor air (EPA or CalEPA) should be used with an attenuation factor of 0.03 to calculate the VISL. Basically, Locus should had divided the values proposed on their original report by 0.03 to define the soil gas VISL.

Please send us a corrected Table 4 so we can proceed reviewing the report and avoid further delays in this investigation.

Thank you,

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From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Wednesday, June 8, 2022 8:51 PM
To: Abreu, Lilian <abreu.lilian@epa.gov>; Africa Espina <guzuna@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Alan Tuan <tuana@locustec.com>; Condit, Rose <rose.condit@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue, CERCLIS Site ID CAD070466479

Hi Lilian:

This Building-Specific Addendum for 811 East Arques Avenue has been revised to address your comments below. Attached is a revised copy of the addendum, plus a response-to-comments letter describing the specific changes that were made. This revised plan has also been reviewed by the property owner (Lowe's) to confirm that they agree with the updated sampling approach.

Locus will proceed with scheduling this sampling effort once we have EPA approval.

Thank you,

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From: Abreu, Lilian <abreu.lilian@epa.gov>
Sent: Tuesday, April 19, 2022 1:35 PM
To: Africa Espina <guzuna@locustec.com>; J. Wesley Hawthorne <hawthornej@locustec.com>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Alan Tuan <tuana@locustec.com>; Condit, Rose <rose.condit@aptim.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: Building-Specific Work Plan Addendum, 811 E. Arques Avenue, CERCLIS Site ID CAD070466479

Hello Africa and Wes,

EPA reviewed the work plan addendum for 811 E. Arques Ave and is providing the comments below. Please let me know if you would like to meet in the next couple of weeks to discuss the comments facilitating the review and approval process.

Review Comments:

1. Contaminant volatilizing from a groundwater source migrates in all directions in the vadose zone including areas that are hydraulically upgradient. According to that, the following statement on Section 2.2, page 14, should be revised for accuracy: "*Higher concentrations of TCE are located at the north end of the Property near the historical source, however because the current building is hydraulically upgradient of this area, those concentrations are not expected to impact VI levels in the building*".

2. Section 3.3. page 17. It is indicated that the building foundation was constructed with a moisture barrier under the concrete slab. Clarify if the subslab implants installation could break through this barrier and how that could be affected or repaired.
3. Section 3.5.1. page 17. Include a description of the sewer and its depth below ground. Discuss if it is expected that the sewer line could be below the water table at any location across the site.
4. Section 4.2.2, page 23. include unsealed utility penetrations, floor drains and impacted sewer lines as potential migration pathways.
5. Section 5. page 27
    a. Include in the main text a summary description of subslab installation and sampling procedures and attached to the document the SOPs for these procedures. Sampling flow rate should not exceed 200 mL/min. Leak test using a shroud and a tracer gas should be implemented. Examples of tracer gas that are commonly used for leak test are DFA and helium.
    b. Replace the six-liter summa canister by 1 liter summa canister (or lower volume). It is recommended to use smaller volumes for canisters as the sampling flow rate should not exceed 200 ml/min and a leak test using a shroud should be performed. Large volume canisters should be avoided as it would imply long time for sampling based on the recommended flow rate.
    c. It is recommended that each proposed sampling location be sampled twice to evaluate temporal variability. Clarify if the vapor ports will be secured in place to allow for a second round of sampling.
    d. Table 3 presents "indoor air quality evaluation criteria", since this report is about subsurface sampling, replace that table or include another table for the evaluation criteria of the subsurface soil gas. EPA recommends using the VISL (vapor intrusion screening levels) for screening purpose and to define laboratory detection limits and associated QA/QC relative to soil gas.
    e. Include five additional subslab sampling locations as indicated by the red stars in slide 4 of the pdf file attached. Two locations on the north side that is closest to the source area. Two locations on the west side for spatial coverage. The fifth additional subslab location should be in the women restroom not identified in the layout figure provided.
    f. Include the collection of a grab sample from each of floor drains observed in the janitor closet and men/women restrooms
    g. If sewer is expected to be below water table across the site, include collection of a grab sample from a sewer cleanout.
    h. Please indicate the north direction in each figure provided in the report, particularly if they are not oriented to the same direction.

Please confirm receipt of this message and the estimated schedule to provide a revised draft.

Thank you,

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From: Africa Espina <guzuna@locustec.com>
Sent: Thursday, March 17, 2022 2:17 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Barker, Shau-Luen <ShauLuen.Barker@philips.com>; Woo, Cynthia <cynthia.woo@aptim.com>; Abreu, Lilian <abreu.lilian@epa.gov>; J. Wesley Hawthorne <hawthornej@locustec.com>; Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Alan Tuan <tuana@locustec.com>
Subject: Building-Specific Work Plan Addendum, 811 E. Arques Avenue, CERCLIS Site ID CAD070466479

Hello Michael,

Attached is the Building-Specific Work Plan Addendum for the 811 East Arques Avenue property on the Signetics Site, in accordance with Section IV.B of the Statement of Work for the Signetics ASAOC, and following Section 3.5 of the Vapor Work Plan for the Site. Please let me know if you have any questions.

Regards,
Africa

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